

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10493 GAO

MANUEL ROSA  
Plaintiff,

v.

CITY OF BOSTON  
Defendant,

**PLAINTIFF MANUEL ROSA'S AMENDED ANSWERS TO  
DEFENDANT CITY OF BOSTON'S FIRST SET OF  
INTERROGATORIES**

Now comes the Plaintiff, Manuel Rosa, and hereby amends his answers to the Defendant, City of Boston's First Set of Interrogatories.

**Interrogatory No. 8**

Describe all of the injuries and complaints of any nature whatsoever (whether objective or subjective) as a result of these incidents or which you or your doctors are aware of or suspect, including but not limited to the following specific details.

- (a) List and describe each specific injury, giving the exact location or upon your body of all injuries, and the nature of your complaint ( whether physical, dental, emotional, nervous, mental or psychological ).
- (b) If you have completely recovered from each such injury and complaint, state the date you recovered from such injury or complaint.
- (c) list separately all of your present disabilities and complaints ( whether objective or subjective ), the frequency and duration of your complaints of pain, etc., the location of and degree of any limitations of motion you know have, and a detailed description of any scars you have at the present time, which you attribute to the incident.
- (d) Separately list and describe each of your claimed permanent disabilities.
- (e) If you claim any permanent scars, disfigurement or other cosmetic defect, present or potential, as a result of the incident, describe in detail the area of the body affected, the approximate dimension of the area, and the name and address of any person who has taken any photographs showing injury and when taken.

(f) If as a result of any injury in the incident sued upon, any doctor gave you a temporary or permanent disability rating, give the name and address of the doctor, what the rating covers, when the rating was made, the percentage of rating and the rate therefor.

Amended Answer to  
Interrogatory No. 8.

(a and b ) When I answered this Interrogatory on or about February 21, 2005, I believed I was being asked that at the time of my arrest(s), whether I was intentionally harmed by the police officers and whether I was physically injured as a result. I interpreted the questions [ interrogatory ] to mean just that. At no time was I ever intentionally beaten or abused. However, I was physically 'manhandled' on each occasion of my arrest. I was handcuffed each time as well. Although I cannot describe these actions as 'injuring me' at the time, said actions certainly caused me minor pain and acute discomfort. I indicated in my initial response to interrogatory No. 8 that I get nervous when I see a police car. In actuality, I experienced, and still do, great feelings of anxiety when I see a police officer or police vehicle. As I stated, this anxiety amounts to great fear that I still have of perhaps being arrested again by the police and placed in jail.

I am now informed by my attorney, and I now better understand, that if I experienced sleep disorders, loss of appetite, severe headaches, depression, anxiety, etc., that these are 'physical injuries' that was and is being asked of me in Interrogatory No. 8 and during my deposition.

From the moment of the first arrest to this very day, I do experience what I believe are 'times of depression 'associated with these arrests. I feel that my self-worth as a person is no longer the same. And that when some of my friends and family remind of the arrests, I get depressed on how I felt then and how I feel now. For many years during and after the arrest(s) I would have nightmares that I would be arrested in the middle of the night. Thankfully, I do not have these dreams so much anymore. I have never seen a doctor or been treated, I still believe these 'injuries' I just described are not permanent but I guess I really do not know.

Signed under the pains and penalties of perjury this \_\_\_\_ day of April, 2006.

Manuel Rosa  
Manuel Rosa

**CERTIFICATE OF SERVICE**

I, Arthur L. Kelly, hereby certify that I served Plaintiff Manuel Rosa's Amended Answers to Defendant City of Boston's First Set of Interrogatories by mailing a copy via first class U.S. mail, postage pre-paid to:

Kenneth J. Forton  
Assistant Corporation Counsel  
City of Boston Law Department  
Room 615, City Hall  
Boston, MA 02201

Date: April 11, 2006

  
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Arthur L. Kelly